

# EXHIBIT D

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS )  
LIABILITY LITIGATION )**

\_\_\_\_\_  
**THIS DOCUMENT RELATES TO:**

**All Suits Against the Saint Thomas Entities**

**MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)**

---

**Notice to UniFirst Corporation of 30(b)(6) Deposition**

---

Defendants, Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network (collectively the “Saint Thomas Entities”), pursuant to Federal Rule of Civil Procedure 30(b)(6), come now and give notice that the oral and videotaped deposition of UniFirst Corporation d/b/a UniClean Cleanroom Services (“UniFirst”), as an organization, will be taken on the topics detailed below. UniFirst shall identify the person(s) who will speak on its behalf on each topic at least seven (7) days before the deposition(s).

The deposition will be taken on June 18, 2015, beginning at 9:00 a.m. (EDT) and continuing until completed. The deposition will take place at the offices of Goodwin Proctor LLP, Exchange Place, Boston, Massachusetts 02109. The deposition will be recorded by stenographical means and by video.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), UniFirst’s designee(s) shall be prepared to testify regarding the following subjects:

1. The cleaning services provided, and chemicals and utensils used, by UniFirst at 687-705 Waverly Street, Framingham, Massachusetts, 01702 (hereafter “NECC Facility”);
2. The history of UniFirst’s business relationship with NECC or Ameridose, including all contracts applicable to any portion of the NECC facility;
3. The prices charged for services provided to any portion of the NECC facility;
4. Communications between NECC and UniFirst regarding concerns over the services being provided at any portion of the NECC facility, including without limitation Exhibit “C” to the Saint Thomas Entities’ discovery requests, and any resulting investigation or analysis;
5. UniFirst’s marketing of its cleaning services, including without limitation Exhibits “A” and “B” to the Saint Thomas Entities’ discovery requests;
6. UniFirst’s responses to the Saint Thomas Entities’ discovery requests, including without limitation the documents produced in response;
7. UniFirst’s compliance with Current Good Manufacturing Practices;
8. Training and management of persons providing services at any part of the NECC facility, including without limitation any cleanrooms;
9. The persons providing the cleaning services at the NECC facility, including their background, work history, education and training and employee files;
10. Information known or available to UniFirst regarding the circumstances of the contamination of MPA at the NECC Facility, the outbreak of fungal meningitis across several states, and the closing of NECC and Ameridose; and
11. Documents produced by any party on the US Legal repository involving any UniFirst representative or employee.

Respectfully submitted,

/s/ Adam T. Schramek

Sarah P. Kelly (BBO #664267)  
skelly@nutter.com

NUTTER McCLENNEN & FISH LLP  
Seaport West  
155 Seaport Boulevard  
Boston, Massachusetts 02210  
(617) 439-2000  
(617) 310-9461 (FAX)

Yvonne K. Puig\*  
Texas State Bar No. 16385400  
yvonne.puig@nortonrosefulbright.com  
Adam T. Schramek\*  
Texas State Bar No. 24033045  
adam.schramek@nortonrosefulbright.com  
Eric J. Hoffman\*  
Texas State Bar No. 24074427  
eric.hoffman@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP  
98 San Jacinto Blvd., Suite 1100  
Austin, Texas 78701  
(512) 536-2450  
(512) 536-4598 (FAX)

Marcy Hogan Greer\*  
Texas State Bar No. 08417650  
mgreer@adjtlaw.com

ALEXANDER DUBOSE JEFFERSON &  
TOWNSEND LLP  
515 Congress, Suite 2350  
Austin, Texas 78701  
(512) 482-9300  
(512) 482-9303

\*Appearing Pro Hac Vice

**CERTIFICATE OF SERVICE**

I certify that unless noted otherwise below, the foregoing was served by electronic mail on the 28<sup>th</sup> day of April, 2015.

Adam T. Schramek

Adam T. Schramek

Alan M. Winchester  
Frederick H. Fern  
Harris Beach, PLLC  
100 Wall Street  
New York, NY 10005

Robert H. Gaynor  
John P. Ryan  
William J. Dailey, Jr.  
Sloane & Walsh LLP  
Three Center Plaza  
Boston, MA 02108  
[rgaynor@sloanewalsh.com](mailto:rgaynor@sloanewalsh.com)  
[wdaileyjr@sloanewalsh.com](mailto:wdaileyjr@sloanewalsh.com)  
[jryan@sloanewalsh.com](mailto:jryan@sloanewalsh.com)

Bruce A. Singal  
Callan G. Stein  
Michelle R. Peirce  
Donoghue, Barrett & Singal, PC  
Suite 1320  
One Beacon Street  
Boston, MA 02108-3113  
[bsingal@dbslawfirm.com](mailto:bsingal@dbslawfirm.com)  
[mpeirce@dbslawfirm.com](mailto:mpeirce@dbslawfirm.com)  
[cstein@dbslawfirm.com](mailto:cstein@dbslawfirm.com)

*Counsel for the Caddens, Conigliaros and  
Chin*

J. Gerard Stranch, IV  
Benjamin A. Gastel  
Branstetter, Stranch & Jennings PLLC  
227 Second Avenue North  
Nashville, TN 37201  
[gerards@bsjfirm.com](mailto:gerards@bsjfirm.com)  
[beng@bsjfirm.com](mailto:beng@bsjfirm.com)

Mark Zamora  
Mark Zamora and Associates  
5 Concourse Parkway, Suite 2350  
Atlanta, GA 30328  
[mark@markzamora.com](mailto:mark@markzamora.com)

Rick Ellis  
Ellis & Rapacki LLP  
85 Merrimac Street  
Suite 500  
Boston, MA 02114  
[rellis@ellisrapacki.com](mailto:rellis@ellisrapacki.com)

Mark P. Chalos  
Lief Cabraser Heimann & Bernstein, LLP  
150 Fourth Avenue North, Suite 1650  
Nashville, TN 37219-2417  
[ecabraser@lchb.com](mailto:ecabraser@lchb.com)  
[mchalos@lchb.com](mailto:mchalos@lchb.com)

*Members of the Plaintiffs' Steering Committee*

<p>C.J. Gideon Chris Tardio Gideon, Cooper &amp; Essary PLC 315 Deaderick St., Suite 1100 Nashville, TN 37238 <a href="mailto:cj@gideoncooper.com">cj@gideoncooper.com</a> <a href="mailto:chris@gideoncooper.com">chris@gideoncooper.com</a></p> <p><i>Counsel for STOPNC</i></p> <p>Daniel Rabinovitz Nicki Samson Brady Hermann John Wells Michaels, Ward &amp; Rabinovitz, LLP One Beacon Street 2nd Floor Boston, MA 02108 <a href="mailto:dmr@michaelsward.com">dmr@michaelsward.com</a> <a href="mailto:ns@michaelsward.com">ns@michaelsward.com</a> <a href="mailto:bjh@michaelsward.com">bjh@michaelsward.com</a> <a href="mailto:jkw@michaelsward.com">jkw@michaelsward.com</a></p> <p><i>Counsel for MSM</i></p> <p>Franklin H. Levy Lawson &amp; Weitzen 88 Black Falcon Avenue Suite 345 Boston, MA 02210 <a href="mailto:fhlevy@gmail.com">fhlevy@gmail.com</a></p> <p><i>Counsel for Alaunus</i></p> <p>Peter Hermes 265 Franklin Street, Seventh Floor Boston, MA 02110 <a href="mailto:phermes@hermesnetburn.com">phermes@hermesnetburn.com</a></p> <p><i>Counsel for Liberty</i></p>	<p>James Rehnquist Roberto M. Braceras Goodwin Procter, LLP Exchange Place 53 State Street Boston, MA 02109 <a href="mailto:jrehnquist@goodwinprocter.com">jrehnquist@goodwinprocter.com</a> <a href="mailto:rbraceras@goodwinprocter.com">rbraceras@goodwinprocter.com</a></p> <p><i>Counsel for UniFirst By E-mail and U.S. Mail</i></p> <p>Joseph P. Thomas Joshua A. Klarfeld Ulmer &amp; Berne LLP 600 Vine Street Suite 2800 Cincinnati, OH 45202 <a href="mailto:jthomas@ulmer.com">jthomas@ulmer.com</a> <a href="mailto:jklarfeld@ulmer.com">jklarfeld@ulmer.com</a></p> <p>Robert A. Curley , Jr. Curley &amp; Curley P.C. Suite 103 35 Braintree Hill Office Park Braintree, MA 02184 <a href="mailto:rac@curleylaw.com">rac@curleylaw.com</a></p> <p><i>Counsel for GDC</i></p> <p>Matthew P. Moriarty Kimberly Langelier Tucker Ellis 950 Main Avenue, Suite 1100 Cleveland, OH 44113 <a href="mailto:matthew.moriarty@tuckerellis.com">matthew.moriarty@tuckerellis.com</a>, <a href="mailto:kimberly.langelier@tuckerellis.com">kimberly.langelier@tuckerellis.com</a></p> <p><i>Counsel for Ameridose</i></p>
--	---